

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Cassandra Bonita Woods,

Debtor.

Case No. 22-12757-mdc

Chapter 13

Debtor's Motion to Approve Loan Payoff

AND NOW, Debtor Cassandra Bonita Woods, by and through her attorney, moves this Court as follows:

1. On November 14, 2024, Flagship Credit Acceptance filed Claim No. 6, which is fully secured by a 2012 Mercedes-Benz E 350, VIN WDDHF8JB6CA604821 in the amount of \$9,592.60.
2. To date, the chapter 13 trustee has paid \$1,675.16 to Flagship on Claim No. 6.
3. The Mercedes was recently totaled in an accident.
4. USAA Insurance has offered the Debtor a settlement of \$7,134.14 to pay off the loan on the Mercedes. Exhibit A.
5. The Debtor requests entry of an order directing USAA to pay Flagship accordingly.

NOW, THEREFORE, the Debtor asks this Court to grant relief in the form of order attached and to grant such other relief in her favor as may be necessary and proper under the law.

Date: March 28, 2024

CIBIK LAW, P.C.
Counsel for Debtor

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